

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re:

Plaza Mariachi, LLC,

Debtor.

Chapter 11

Case No. 3:24-bk-02441

Judge Hon. Charles M. Walker

**NOTICE OF AND MOTION FOR ENTRY OF AGREED ORDER VACATING
HEARING ON DISCLOSURE STATEMENT AND RELATED OBJECTION
DEADLINE**

Plaza Mariachi, LLC (the “Debtor”), debtor and debtor-in-possession in the above-captioned Chapter 11 case (the “Bankruptcy Case”), hereby moves the Court for entry of the *Agreed Order Vacating Disclosure Statement Hearing and Related Objection Deadline* in the form attached hereto as Exhibit A (the “Agreed Order”). On July 28, 2025, the Debtor filed a proposed Plan of Reorganization [Dkt. 135] (the “Plan”) and a Disclosure Statement in Support of Plan of Reorganization [Dkt. 136] (“Disclosure Statement”). On August 4, 2025, the Court entered the *Notice and Order Setting Hearing on Disclosure Statement and Related Deadlines* [Dkt. 137] setting a hearing on the Disclosure Statement for September 10, 2025 at 11:00 a.m. with an objection deadline of September 3, 2025. The Debtor is in the process of preparing an amendment to the Plan to address objections raised informally by the United States Trustee, First Financial Bank, N.A. (“FFB”), and Capital One, National Association (“Capital One”). Accordingly, the Debtor, FFB, and Capital One have stipulated that the September 10, 2025 hearing on the Disclosure

Statement should be vacated, along with the September 3, 2025 deadline to object to the Disclosure Statement. After an amended plan and disclosure statement have been filed, the Debtor will ask the Court to set a new hearing on the Disclosure Statement on at least 28 days' notice to all creditors.

WHEREFORE, the Debtor respectfully requests that the Court enter the Agreed Order.

Dated: August 18, 2025.

Respectfully Submitted,

Plaza Mariachi, LLC, Debtor-in-Possession

By: /s/Todd A. Burgess, Esq.
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(Admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NOTICE OF AND MOTION FOR ENTRY OF AGREED ORDER VACATING HEARING ON DISCLOSURE STATEMENT AND RELATED OBJECTION DEADLINE** was filed electronically on August 18, 2025 and notice of this filing was given via First Class U.S. Mail to the United States Trustee and all creditors and interested parties on the Debtor's most up-to-date Master Mailing List.

/s/Todd A. Burgess, Esq.
Counsel for Debtor

EXHIBIT A

**AGREED ORDER VACATING HEARING ON DISCLOSURE STATEMENT
AND RELATED OBJECTION DEADLINE**

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Judge Hon. Charles M. Walker

**AGREED ORDER VACATING HEARING ON DISCLOSURE STATEMENT
AND RELATED OBJECTION DEADLINE**

THIS MATTER COMES BEFORE THE COURT pursuant to the *Notice Of And Motion For Entry Of Agreed Order Vacating Hearing On Disclosure Statement And Related Objection Deadline* (the “Motion”) filed by debtor-in-possession Plaza Mariachi, LLC (“Debtor”). Pursuant to the Motion, the Debtor asks the Court to enter this order (the “Agreed Order”) vacating the September 10, 2025 hearing on the Debtor’s Disclosure Statement in Support of Plan of Reorganization [Dkt. 136] (the “Disclosure Statement”)

and the related September 3, 2025 deadline to object to the Disclosure Statement. Based on all of the foregoing, and good cause appearing,

IT IS HEREBY ORDERED:

1. The September 10, 2025 hearing on the Disclosure Statement and the September 3, 2025 deadline to object to the Disclosure Statement are vacated.

2. After an amended plan and disclosure statement have been filed, the Debtor is directed to request a new hearing on the amended Disclosure Statement on at least 28 days' notice to all creditors.

**THIS ORDER WAS SIGNED AND ENTERED ELECTRONICALLY
AS INDICATED AT THE TOP OF THE FIRST PAGE**

STIPULATED, AGREED TO, AND APPROVED FOR ENTRY BY:

PLAZA MARIACHI, LLC

By: /s/Todd A. Burgess

Todd A. Burgess (AZ SBN 019013) (*Admitted Pro Hace Vice*)

Janel M. Glynn (AZ SBN 025497) (*Admitted Pro Hace Vice*)

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By: /s/Mark Bogdanowicz

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